

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE**

<b>JOHN DOE,</b>	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	<b>Civil Action No: 3:22-cv-569</b>
	)	
<b>William Lee, Governor of the State of Tennessee, in his official capacity,</b>	)	<b>Judge Richardson</b>
	)	
<i>Et al.</i>	)	<b>Magistrate Judge Newbern</b>
	)	
	)	
<i>Defendants.</i>	)	

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**PLAINTIFF’S MOTION TO FILE UNDER SEAL**

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Comes now Plaintiff, by and through Counsel, and moves this Honorable Court pursuant to Local Rule 5.03 and Administrative Practices and Procedures for ECF Filing § 5.07 to authorize Plaintiff to make a sealed filing of Exhibits D and E to his Motion to Proceed Under Pseudonym and for a Protective Order. These exhibits contain highly sensitive, identifying information that, if publicly disclosed, would totally undermine Plaintiff’s motion.

Plaintiff is providing copies of these exhibits to Counsels for Defendants contemporaneously with the filing of this motion. Should the Court deny this motion, Plaintiff respectfully requests that in the alternative the Court strike these exhibits from the record so that they are not publicly accessible.

Respectfully submitted,

s/ Kyle Mothershead

Kyle Mothershead, BPR 22953

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### **CERTIFICATE OF SERVICE**

I hereby certify that on **August 30, 2022**, Plaintiff's **Motion to File Under Seal** was filed electronically with the Court's electronic filing system. Notice of this filing will be served on **Attorneys Robert Mitchell and Miranda Jones, Counsels for Defendants Lee and Rausch**, at [Robert.mitchell@ag.tn.gov](mailto:Robert.mitchell@ag.tn.gov) and [miranda.jones@ag.tn.gov](mailto:miranda.jones@ag.tn.gov).

s/ Kyle Mothershead

Kyle Mothershead, BPR 22953